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**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

HOWARD B. HIGGINS, an individual,
Plaintiff,

vs.

FARR FINANCIAL INC., a California
Corporation, ZENITH INVESTMENT
GROUP LLC, a California Limited
Liability Company, AMAECHI
GEORGE OZOR, an individual, and
JOHN/JANE DOES I-X, individuals or
entities whose identities are unknown,
Defendants.

Case No. C 07-02200 JSW

**STIPULATION AND
PROPOSED ORDER**

1 Defendant, Farr Financial, Inc. ("Farr") and Plaintiff, Howard B. Higgins
2 ("Higgins"), by and through their respective attorneys, submit this stipulation, in which
3 they agree as follows:

4 This matter has been resolved as between Higgins and Farr. Counsel for Higgins
5 and counsel for Farr are presently preparing a settlement agreement and mutual release.
6

7 Therefore, Farr and Higgins stipulate and jointly request that all pending litigation
8 deadlines, as well as the pre-trial conference and bench trial, be vacated.
9

10 Good cause exists to grant this stipulation. Submissions prior to the pre-trial
11 conference are due filed with the Court on October 3, 2011. However, the parties cannot
12 have all the settlement documents signed and dismissal papers filed before that date.
13 Therefore, the parties request that they be given until October 7, 2011 to file dismissal
14 documents with the Court.
15

16 IT IS SO STIPULATED.

17
18 Dated: September 28, 2011

NORMAN G. REECE, P.C.

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21 By: /s/ Norman G. Reece, Jr.

NORMAN G. REECE, JR.

22 Attorney for Plaintiff, Howard B. Higgins
23 *(Pro Hac Vice)*

24 Dated: September 28, 2011

HOWARD J. STEIN & ASSOC.

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26 By: /s/ Howard J. Stein

HOWARD J. STEIN

27 Attorneys for Defendant, Farr Financial, Inc.
28 *(Pro Hac Vice)*

ORDER

Good cause appearing, **IT IS ORDERED** that the stipulation is **GRANTED**. All pending litigation deadlines, as well as the pre-trial conference and bench trial, are hereby vacated. Farr Financial, Inc. and Howard B. Higgins, through their respective counsel, shall file dismissal papers by October 7, 2011.

IT IS SO ORDERED.

Dated: September _____, 2011

HON. JEFFREY S. WHITE
United States District Judge